

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

Daniel E. Hall

Plaintiff,

v.

Twitter, Inc..

Defendant.

Civil Action No.: 1:20-cv-00536-SE

MOTION FOR LEAVE TO FILE MOTIONS AND PAPERS

Now comes the defendant, X Corp., as successor in interest to named defendant Twitter, Inc. (“Twitter”), by and through undersigned counsel, and hereby moves this Honorable Court to permit it to file certain motions and papers necessary to substitute its counsel of record, and to comply with Rule 7.1(b)(2), stating as follows:

1. On November 30, 2022, this Court imposed a stay on all filings from both parties, “except as necessary on an emergency basis and only with prior leave of the court (that is, by way of first seeking, and obtaining, leave to file),” until resolution of Twitter’s pending motion to dismiss, or further instruction of the Court. Doc. 124.

2. Recently, Twitter underwent changes in corporate structure necessitating a supplemental filing under Rule 7.1. Therefore, Twitter seeks leave to file a supplemental disclosure statement pursuant to Rule 7.1(b)(2), attached hereto

as Exhibit A.

3. Twitter also seeks leave to file a motion to substitute its counsel in this matter.

4. Twitter is currently represented in this matter by Perkins Coie LLP and Orr & Reno P.A. (collectively, “Outgoing Counsel”).

5. Twitter has requested that Willenken LLP and Drummond Woodsum (collectively, “Incoming Counsel”) represent it in the above-captioned matter, including with respect to the pending motion to dismiss.

6. Pursuant to Local Rule 83.6(d), Outgoing Counsel require leave of the Court to withdraw. Therefore, to effectuate this change in counsel, Twitter respectfully requests leave to file the following motions:

a. A motion to substitute counsel. Exhibit B.

b. A motion to admit Kenneth M. Trujillo-Jamison, of Willenken LLP, *pro hac vice* pursuant to Local Rule 83.2(b). Exhibit C.

7. Additionally, Incoming Counsel will need to file their respective appearances and Outgoing Counsel will need to file their respective withdrawals at the appropriate times.

8. Under Local Rule 7.1(c), Outgoing Counsel and Incoming Counsel certify that a good faith attempt has been made to obtain Plaintiff’s concurrence in the relief sought by this motion, but Plaintiff does not concur.

9. Given the nature of relief requested herein, no memorandum of law is necessary.

WHEREFORE, Twitter respectfully requests this Honorable Court:

- A) GRANT Twitter leave to file a supplemental disclosure statement pursuant to Rule 7.1, attached hereto as Exhibit A; and
- B) GRANT Twitter leave to file a motion for substitution of counsel, attached hereto as Exhibit B; and
- C) GRANT Twitter leave to file a motion to admit Twitter's Incoming Counsel, Kenneth M. Trujillo-Jamison, of Willenken LLP, *pro hac vice* pursuant to Local Rule 83.2(b), attached hereto as Exhibit C; and
- D) For such further relief this Court deems appropriate.

Respectfully Submitted,

Incoming Counsel for Twitter

DRUMMOND WOODSUM

Dated: April 12, 2023

By: /s/ Demetrio Aspiras
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CERTIFICATE OF SERVICE

I certify that on April 12, 2023, I served the foregoing Motion upon *Pro Se* Plaintiff, Daniel E. Hall, and counsel of record via the Court's electronic filing system.

/s/ Demetrio Aspiras
Demetrio F. Aspiras, III., Esq.